

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In re:

DAVID J. HOWE

DEBTOR

Chapter 13

Case No. 20-40229-CJP

**DEBTOR'S MOTION FOR ORDER EXTENDING TIME TO FILE
SCHEDULES A/B-J, FORM 106SUM, FORM 106DEC, FORM 107, FORM 122C-1,
FORM 122C-2, AND CHAPTER 13 PLAN**

David J. Howe, the above-captioned Debtor (“Debtor”), by and through his undersigned counsel, having filed a skeleton petition in the above captioned case, hereby moves this Court for entry of an Order granting a seven (7) day extension of time until 5:00 P.M. on March 19, 2020 to file his *Schedules A/B-J, Form 106Sum, Form 106Dec, Form 107, Form 122C-1, Form 122C-2, and Chapter 13 Plan*. The Debtor filed a skeletal petition on February 13, 2020 to forestall a foreclosure of his residence. A Motion to Extend the Time to File Schedules was filed, which was approved by the Court and the extended deadline was set to March 12, 2020. The §341 meeting of creditors is scheduled for March 27, 2020 at 9:30 a.m..

This is the second extension requested. The Debtor has gathering most of the required documentation, but needs the additional time to gather the remaining required information and documentation and Debtor’s counsel expects to have all needed information to file said documents by or before the above extended due date. The Debtor needs the additional time to gather the more information and documentation (such as copies of retirement/401(k) accounts, tax returns, life insurance policies, and business records) from multiple third party sources, which have already been requested. Where the §341 meeting of creditors is scheduled for March

this request.

Respectfully submitted,

DAVID J. HOWE

By his attorney,

/s/ Richard A. Mestone

Richard A. Mestone (BBO# 642789)

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Dated: March 11, 2020

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DISTRICT OF MASSACHUSETTS
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CERTIFICATE OF SERVICE

I, Richard A. Mestone, hereby certify that on this day, I electronically filed the *Debtor's Second Motion for Order Extending Time to File Schedules A/B-J, Form 106SUM, Form 106DEC, Form 107, Form 122C-1, Form 122C-2, and Chapter 13 Plan* with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF system. I have served true and correct copies of the foregoing document only via CM/ECF upon the United States Trustee, including the Chapter 13 Trustee, Denise Pappalardo, and individuals who have filed notices of appearance and requests for notice in the Court's CM/ECF database.

Date: March 11, 2020

/s/ Richard A. Mestone
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